

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

17 005

In the Matter of	§	
	§	RM-8626
Amendment of Section	§	
97.111 (b) (5) and (6)	§	

With over 450 members, the Dallas Amateur Radio Club, Inc., organized in 1914, is one of the oldest and largest amateur radio clubs in the country. Amateur radio operators from all license classes make up the membership which is involved in a broad range of activities serving both the amateur and the Dallas-Fort Worth community at large.

Mr. Frederick O. Maia, W5YI, is petitioning to eliminate the Commission's rules which permit one-way amateur information bulletins and Morse code practice in the amateur bands below 30 MHz. We feel this petition is (1) contrary to the best interests of amateur radio, (2) detrimental to Public Service and at best (3) self-serving on the part of the petitioner. We urge the Commission to deny this petition.

-1-

Since the early-1900s, amateur radio operators and those desiring to be amateur radio operators have depended on broadcasts from stations such as W1AW (operated by the American Radio Relay League, Inc.) for information bulletins and Morse code practice transmissions. "Broadcasts" made by W1AW are transmitted at scheduled intervals on published amateur frequencies.

At the April 5, 1995 meeting of our club, 99% of those present (over 75 licensed amateurs) indicated by a show of hands that they listened to W1AW's transmissions on a regular basis either at the present time or during preparation for their license examinations. It is an established element of our club's license training program to recommend potential operators and upgrade candidates to monitor Morse code transmissions from stations such as W1AW to increase their proficiency in Morse code. Furthermore, code practice transmissions give the individual actual "hands-on" experience in receiving Morse code transmissions over the air— something a computer software package cannot do. In a large measure our ability to utilize this asset, supported solely by League activities, enhances the Commission's long-standing position on the orderly development and advancement within the Amateur Service.

RM-8626

No. of Copies rec'd 0410
List ABCDE

Page 1

Further, substantial information concerning the Amateur Service is gleaned from the free and unrestricted receipt of non-commercial information bulletins transmitted on a regular schedule from W1AW. It is the strong belief of our club that receipt of this information is necessary to ensure good operating practice and continued access to it is vital to the Amateur Service.

-2-

Realizing that in a time of immediate threat to life or property, amateurs may use what ever means necessary to establish radio communications, regular transmissions from W1AW and others help increase awareness of amateur radio's ability to respond to emergency situations. It is probable, though not quantifiable, that through the efforts of W1AW and others the ability of individual amateur radio operators to assist in their public service mission is greatly enhanced.

Regular training bulletins, official notices from the Commission and other matters relating to disaster communications are an essential part of so-called one-way broadcasts. A vital case in point was the recent earthquake in Japan whereby W1AW advised American amateurs that absent a third party traffic agreement we would be unable to assist Japanese amateurs in the emergency to the extent we could have done so. This information was quickly and accurately "broadcast" at no expense to the United States Government by W1AW.

-3-

The petitioner has a pecuniary interest in passage of his petition. His business activities include the development and production of study and license preparation materials as well as running one of the largest Volunteer Exam Coordinators in the country. Additionally he is responsible for the publication and sale of subscriptions of the monthly "W5YI Report," a newsletter of "information bulletins" for those interested amateur radio. His other business ventures also include a renewal service for amateur radio licenses for a \$5.00 fee. Even to the casual observer, Mr. Maia is in a position to profit personally from a favorable ruling on his petition.

The American Radio Relay League, Inc. indeed is involved in many of the same enterprises as Mr. Maia (except to our knowledge the League sends Commission renewal forms and information free of charge). We believe however, there is an enormous difference between a not-for-profit educational corporation whose singular mission is to further the amateur radio art and a private individual seeking to further his personal business interests by federal mandate.

The members of the Dallas Amateur Radio Club, Inc., through its officers and Board-of-Directors, respectfully ask the Commission to deny Mr. Maia's petition.

Submitted this 12th day of April, 1995 by order of the Board of Directors:



John H. Miller, KK5IM
President, Dallas Amateur Radio Club, Inc.



Karl Meyer, N5UOI
Secretary, Dallas Amateur Radio Club, Inc.